

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JULIAN SAMUELS, a/k/a “Trigger,” a/k/a Michael Smith	:	VIOLATIONS:
	:	21 U.S.C. §§ 841(a)(1), (b)(1)(B) (possession with intent to distribute more than 5 grams of cocaine base (“crack”) - 1 count)
	:	21 U.S.C. § 860 (possession with intent to distribute more than 5 grams of cocaine base (“crack”) within 1,000 feet of a school - 1 count)
	:	18 U.S.C. § 924(c)(1) (possessing a firearm in furtherance of a drug trafficking crime - 1 count)
	:	18 U.S.C. § 922(g)(1) (felon in possession of a firearm - 1 count)
	:	Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about July 7, 2002, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

JULIAN SAMUELS,
a/k/a “Trigger,”
a/k/a “Michael Smith”

knowingly and intentionally possessed with intent to distribute in excess of 5 grams, that is,

approximately 16 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 7, 2002, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JULIAN SAMUELS,
a/k/a “Trigger,”
a/k/a “Michael Smith”**

knowingly and intentionally possessed with intent to distribute in excess of 5 grams, that is,
approximately 16 grams, of a mixture or substance containing a detectable amount of cocaine
base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property
comprising the Commodore John Barry Elementary School, a public elementary school, located at
5900 Race Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code,
Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 7, 2002, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JULIAN SAMUELS,
a/k/a “Trigger,”
a/k/a “Michael Smith”**

knowingly possessed a firearm, that is, a Glock, Model 19, 9 mm. semi-automatic handgun,
loaded with fifteen (15) 9 mm. luger bullets, including 1 in the chamber, in furtherance of a drug
trafficking crime for which he may be prosecuted in a Court of the United States, that is,
possession with intent to distribute more than 5 grams of cocaine base (“crack”), in violation of
Title 21, United States Code, Section 841(a)(1), and possession with intent to distribute more
than 5 grams of cocaine base (“crack”) within 1,000 feet of a school, in violation of 21 United
States Code, Section 860.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 7, 2002, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JULIAN SAMUELS,
a/k/a “Trigger,”
a/k/a “Michael Smith,”**

having previously been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm and ammunition, that is, a Glock, Model 19, 9 mm. semi-automatic handgun, loaded with fifteen (15) 9 mm. luger bullets, including 1 in the chamber.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

As a result of the violations of Title 18, United States Code, Sections 922(g)(1) and 924(c) set forth in Counts Three and Four of this Indictment, the defendant

**JULIAN SAMUELS,
a/k/a “Trigger,”
a/k/a “Michael Smith,”**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d) and Title 29, United States Code, Section 2461(c), the firearm and ammunition involved in the commission of these offenses, including, but not limited to:

(1) a Glock, Model 19, 9 mm. semi-automatic handgun, loaded with fifteen (15) 9 mm. luger bullets, including 1 in the chamber.

**All pursuant to Title 28, United States Code, Section 2461(c) and Title 18,
United States Code, Section 924(d).**

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney